

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.,

Plaintiff,

V.

C.A. No. 04-10353-PBS

VOICE SIGNAL TECHNOLOGIES, INC.,
LAURENCE S. GILLICK, ROBERT S.
ROTH, JONATHAN P. YAMRON, and
MANFRED G. GRABHERR,

Defendants.

**MOTION FOR AN ORDER DETERMINING THAT THE NEUTRAL EXPERT
SHOULD NOT CONSIDER SCANSOFT'S MAY 5, 2006 BRIEF**

Voice Signal Technologies, Inc. (“Voice Signal”) hereby moves for an Order Determining that the Neutral Expert Should Not Consider ScanSoft’s May 5, 2006 Brief (“ScanSoft’s Supplemental Brief”). ScanSoft’s Supplemental Brief should not be considered because (1) it presents argument regarding issues that are not before the Neutral Expert but are designed to prejudice his consideration of the issues that are before him; and (2) introduces, at this late stage of the Neutral Expert Procedure, a large number of new alleged trade secrets without any indication that Voice Signal is actually using those trade secrets

The grounds for this motion are set forth in detail in the accompanying memorandum and the exhibits attached thereto.

Respectfully submitted,

Dated: May 11, 2006

VOICE SIGNAL TECHNOLOGIES, INC.

By its attorneys,

/s/ Wendy S. Plotkin

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CERTIFICATE PURSUANT TO LOCAL RULE 7.1

I certify that counsel for Voice Signal conferred with counsel for ScanSoft on May 10, 2006 in an effort to resolve the issues presented in this motion and that the parties were unable to reach an agreement.

/s/ Wendy S. Plotkin

Wendy S. Plotkin

CERTIFICATE OF SERVICE

I hereby certify as follows:

This document filed through the ECF system will be sent electronically to the registered participants in the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on May 11, 2006.

/s/ Wendy S. Plotkin

Wendy S. Plotkin